

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

|                           |   |                        |
|---------------------------|---|------------------------|
| UNITED STATES OF AMERICA, | ) | CASE NO. 8:16-CR-00052 |
|                           | ) |                        |
| Plaintiff,                | ) |                        |
| vs.                       | ) | MOTION TO ENLARGE TIME |
|                           | ) |                        |
| PATRICIA M. URBANOVSKY,   | ) |                        |
|                           | ) |                        |
| Defendant,                | ) |                        |
|                           | ) |                        |

COMES NOW the Defendant, PATRICIA M. URBANOVSKY, by and through her Attorney Joseph Kuehl, and Moves the Court for an ORDER providing for an additional thirty (30) days to review discovery, and file any pretrial motions. Order this motion, the Defendant states and alleges the following;

1. That the court set an initial deadline of June 15, 2016, for the defendant to review discovery and file any pretrial motions;
2. That defense counsel has reviewed all of the material that was provided by the Government in the First wave of Discovery;
3. The defense counsel has completed approximately 90% of the work associated with pretrial motions and briefs, and would be ready to file by the deadline of June 15, 2016;
4. That on Friday, June 10, 2016, government provided defense counsel with additional discovery;
5. That defense counsel estimates they should be able to review the additional discovery, as well as revise, and/or prepare any additional pretrial motions in a couple weeks;
6. That although Defense counsel estimates that they should be able to review the additional discovery, and also revise, and/or prepare any additional pretrial motions in a couple

weeks, they are requesting an additional 30 days so they can be thorough in their preparation, and avoid having to ask the Court for permission to file motions “out of time”;

7. That the undersigned, and Attorney Steve Lefler have spoken with United States Attorney Don Klein Jr., who has expressed that he does not have any objection to this motion;

WHEREFORE, the Defendant respectfully requests an ORDER providing for an additional thirty (30) days to review discovery, and file any pretrial motions, and for any further relief the Court deems just and equitable.

PATRICIA URBANOVSKY, Defendant

By; /s/ Joseph Kuehl  
Joseph Kuehl #23425  
300 S. 19<sup>th</sup> Street, Suite 304  
Omaha, Nebraska 68102  
(402) 342 4433  
Attorney for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on MARCH 22, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to U.S. Attorney Don Kleine Jr.

/s/ Joseph Kuehl